

January 18, 2001

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Docket Management Branch
Food and Drug Administration
Department of Health and Human Services
Room 1-23
12420 Parklawn Drive
Rockville, MD 20857

To Whom It May Concern:

Reference Docket Number 99P-5106

We are writing due to our objection of the term "natural flavor" being used in ingredient lists on various products. Title 21 of the Code of Federal Regulations [21 CFR 101.22(a)(3)] states that "natural flavor" can be almost anything: spices, yeast, vegetables, fruits, meat, seafood, poultry, dairy, eggs, or a number of other things. The current regulations state that natural flavors can contain animal or non-animal ingredients. The consumer has no way to know what the actual ingredients of their food is if the term "natural flavor" is used. For consumers who decide to avoid certain ingredients for health or ethical reasons, the use of the term "natural flavor" is unacceptable.

The Nutrition Labeling and Education Act of 1990 was passed to prevent food companies from misleading consumers as to what their product contains. However, the use of terms like "natural flavor" does just this. Also, *Food Label Close-Up*, by the FDA itself states "the ingredient list helps consumers identify foods that have substances they are allergic to or want to avoid for other reasons." The use of term "natural flavor" does nothing but grant freedom to food companies from declaring what is contained in their product.

Many consumers decide to avoid certain products for various reasons, such as allergy, religious beliefs, food intolerances and ethical beliefs. The food industry should be forced to disclose all ingredients in their products, not just a vague term like "natural flavor". The ingredient labeling standards should be changed to provide information to the consumers who may have a certain objection.

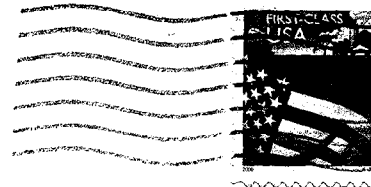
Sincerely,

Kyle Folsom
Chris Small

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